

**U.S. Department of Justice**



*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

July 29, 2022

**BY ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

RE: United States v. Mihai Ionut Paunescu  
13 Cr. 41 (LGS)

Dear Judge Schofield:

As directed by the Court, the Government respectfully submits this letter, with the consent of the defense, to propose a discovery schedule to the Court. The Government requests two months to complete discovery. The evidence in this case is voluminous, including, among other items, over 40 terabytes of electronically stored information. The Government plans to produce discovery to the defense on a rolling basis.

Mr. Ian Marcus Amelkin, Esq., counsel to the defendant, has informed the Government that the defense wishes to schedule a status conference during the week of August 29, 2022, before deciding on a motions schedule. The Government consents to this request. The parties are jointly available on August 30 and 31, 2022, and September 1 and 2, 2022.

The Government further moves, pursuant to 18 U.S.C. § 3161(h)(7)(A) and with the defense's consent, for the exclusion of time from July 30, 2022, through the date of the next status conference. This request is made to allow the Government to continue producing discovery; for

the defense to review discovery and decide what motions, if any, to make; and for the parties to discuss a potential disposition of this case.

A proposed Memo Endorsement is set forth below for the Court's consideration.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by:   
Sarah Lai  
Assistant United States Attorney  
(212) 637-1944

Application Granted. The next status conference is scheduled for August 30, 2022 at 10:30 a.m. a.m./p.m. The Court finds that the ends of justice served by excluding the time between July 30, 2022, and August 30, 2022, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. § 3161(h)(7)(A) because the exclusion would give Defendant time to review discovery and would allow the parties to engage in discussions regarding a potential disposition of this matter. The time between July 30, 2022, and August 30, 2022, is hereby excluded.

Dated: New York, New York  
July -----, 2022  
August 1, 2022

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE